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September 24, 1985
BECO 85-171

Mr. Domenic B. Vassallo, Chief
Operating Reactors Branch #2
Division of Licensing
Office of Nuclear Reactor Regulation
U.S. Nuclear Regulatory Commission
Washington, D. C. 20555

License DPR-35
Docket 50-293

Supplement to Proposed Technical Specification

Reference: Boston Edison Letter dated June 21, 1985:
Proposed Technical Specification Change 85-08

This responds to an NRC request for additional information for the significant hazards consideration relating to the proposed deletion of Table 3.7.1 from Pilgrim Nuclear Power Station (PNPS) technical specifications.

Currently, Table 3.7.1 contains a list of valves which are necessary to provide primary containment isolation. This list is, in fact, a subset of a larger list of primary containment isolation valves which is found in the PNPS Final Safety Analysis Report. The larger FSAR list includes manual valves, and gives a more complete picture of what is needed to ensure primary containment.

The complete list is included in PNPS Procedure No. 2.2.125, which is used to establish a valve's ability to provide primary containment integrity.

Pilgrim adds or deletes valves occasionally as the plant or the state of nuclear design and engineering evolves. These changes are reflected in the FSAR and appropriate procedures as prescribed by the Code of Federal Regulations (CFR), appropriate codes, Reg. Guides, PNPS technical specifications and Boston Edison policies. However, changing Table 3.7.1 to reflect valve changes is a slow process involving reviews by both BECo and the NRC. This leads to long delays before Table 3.7.1 can accurately reflect actual plant configuration, the FSAR, and Procedure 2.2.125. For this reason BECo proposes to delete Table 3.7.1.

BECO has reviewed this proposed deletion and believes that it does not involve a significant increase in the probability or consequences of an accident previously evaluated because primary containment integrity is assured by

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listing isolation valves and their parameters in Procedure 2.2.125 and the FSAR, documents subject to the same rigorous review and control as technical specifications.

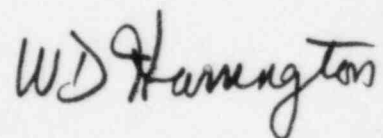
BECO has NRC approved and inspected processes that ensure that these documents accurately reflect plant design, and which provide assurance that inadvertence will not increase the probability or consequence of an accident. BECO also subjects these processes, the FSAR valve list, and Procedure 2.2.125 to an independent review by an NRC accepted BECO Quality Assurance program.

The thoroughness, independence and redundancy of the review process, coupled with the rigor of controlling the subject documents provides assurance that deletion of Table 3.7.1 from technical specifications will not create the possibility of an accident of a type different from any previously evaluated.

Again, processes and procedures are in place which assure that deletion of Table 3.7.1 will not involve a significant reduction in a margin of safety. Margin of safety is guaranteed by the engineering process used to evaluate valve configuration and specifications. In fact, margin of safety may be aided by this proposed deletion because it eliminates a reference which, due to the protracted time required for changing technical specifications, may be in conflict with other, more easily updatable references.

For the reasons given above, BECO believes that sufficient bases exists and has been demonstrated to allow the NRC to make a no significant hazards determination for the proposed change to PNPS technical specifications submitted by letter of June 21, 1985.

Very truly yours,

A handwritten signature in dark ink, appearing to read "W.D. Harrington". The signature is written in a cursive, slightly slanted style.

PMK/ns